

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CRIMINAL DOCKET NO. CR-N-04-30046 MAP

UNITED STATES OF AMERICA

Plaintiff

VS.

DEFENDANT, MARK McCARTHY'S MOTION  
TO EXTEND THE DEADLINE TO FILE A  
MOTION TO DISMISS

ALBERT INNARELLI, ET ALS

Defendants

NOW COMES the Defendant, MARK McCARTHY, in the above-captioned indictment and respectfully moves this Honorable Court order that the deadline for the Defendant to file a Motion To Dismiss be extended from March 3, 2006, until March 24, 2006.


AS REASONS THEREFOR, the Defendant, through counsel, states that he still has not received all discovery in this matter, including loan and closing files that were supposed to have been copied by an outfit designated by the Government known as The Maverick Group located in Springfield, Ma. Despite several telephone calls directly to The Maverick Group regarding the status of said copied files, production of same has not occurred as of the date of this filing.

THIS MOTION to extend the deadline to file a Motion To Dismiss is filed in good faith and is not meant to cause unnecessary delay.

WHEREFORE, the Defendant, MARK McCARTHY, prays said Motion be allowed.

THE DEFENDANT,  
MARK McCARTHY

BY:

  
ROBERT T. SANTANIELLO, ESQ.  
SANTANIELLO & SANTANIELLO, LLC  
83 State Street  
Springfield, MA 01103  
Tel: (413) 781-2132  
Fax: (413) 732-7515  
BBO3560010  
His Attorney

SANTANIELLO &  
SANTANIELLO, LLC  
ATTORNEYS AT LAW  
83 STATE STREET  
SPRINGFIELD, MA 01103  
(413) 781-2132  
FAX (413) 732-7515

CERTIFICATE OF SERVICE

I, ROBERT T. SANTANIELLO, ESQ., hereby certify that copy of the foregoing has been hand-delivered, this 27th day of February, 2006, to: AUSA WILLIAM WELCH, UNITED STATES DISTRICT COURT, DISTRICT OF MASSACHUSETTS, 1550 Main St., Springfield, MA 01103.

  
ROBERT T. SANTANIELLO, ESQ.

cc: Moira L. Buckley, Esq.  
Vincent A. Bongiorno, Esq.  
Maria Durant, Esq.  
Mark J. Albano, Esq.  
Peter Murphy, Esq.  
Gary A. Ensor, Esq.  
Steven W. Leary, Esq.  
Michael O. Jennings, Esq.  
Thomas A. Kokonowski, Esq.  
Kevin G. Murphy, Esq.